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11 Attorneys for Defendants
12 Translucence Research, Inc., Benjamin
Fisch, Charles Lu, Nathan McCarty, and
Benedikt Bünz

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

18 TEMUJIN LABS INC., a Delaware
19 corporation, and TEMUJIN LABS INC., a
Cayman Islands corporation

20 || Plaintiffs,

21 | vs.

22 TRANSLUCENCE RESEARCH, INC., a
23 Delaware corporation, BENJAMIN FISCH,
24 CHARLES LU, BENEDIKT BÜNZ,
25 NATHAN MCCARTY, FERNANDO
KRELL, PHILIPPE CAMACHO CORTINA,
BINYI CHEN, AND LUOYUAN (ALEX)
XIONG, and DOES 1-20.

26 Defendants.

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Temujin Labs Inc., a Delaware
corporation, and Temujin Labs Inc., a
Cayman Islands corporation

CASE NO. 4:21-cv-09152-JST

**STIPULATION EXTENDING
DEFENDANT BENEDIKT BÜNZ'S TIME
TO RESPOND TO THE COMPLAINT**

STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiffs Temujin Labs Inc. (Delaware) and Temujin Labs Inc. (Cayman) (collectively “Plaintiffs”) and Defendant Benedikt Bünz hereby stipulate and agree as follows:

WHEREAS, Plaintiffs filed the operative complaint in this action on November 24, 2021 (the “Complaint”) (Dkt. No. 1);

WHEREAS, Defendants Translucence Research, Inc., Charles Lu, Benjamin Fisch, and Nathan McCarty timely filed a Motion to Dismiss the Complaint on March 18, 2022 (the “Motion to Dismiss”) (Dkt. No. 26);

WHEREAS, the Motion to Dismiss is fully briefed and presently set for hearing before this Court on May 26, 2022 (Dkt. Nos. 28, 29);

WHEREAS, Plaintiffs filed a proof of service of the Summons and Complaint on April 28, 2022, indicating that Plaintiffs personally served defendant Benedikt Bünz (“Bünz”) on April 14, 2022 (Dkt. No. 35);

WHEREAS, the parties recognize that requiring Bünz to move against, answer, or otherwise respond to the Complaint while the fully briefed Motion to Dismiss is pending is inefficient and may unnecessarily waste judicial and party resources, and therefore the parties agree to allow Bünz to move against, answer or otherwise respond to the Complaint at a future date following the Court's decision on the pending Motion to Dismiss;

NOW THEREFORE THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

1. Bünz's deadline to move against, answer, or otherwise respond to the Complaint shall be extended to fourteen (14) days following notice of the Court's decision on the Motion to Dismiss; and

2. In the event the Court grants the Motion to Dismiss and grants Plaintiffs leave to file an amended complaint, undersigned counsel for Bünz agree to accept service of any amended complaint on behalf of Bünz and Bunz's deadline to move against, answer, or otherwise respond to any amended complaint shall be fourteen (14) days from the date of service of the amended complaint on undersigned counsel.

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4 DATED: May 3, 2022

PAUL HASTINGS LLP

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6 By: */s/ Edward Han*
EDWARD HAN
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8 Attorneys for Defendants
9 Translucence Research, Inc., Benjamin Fisch,
10 Charles Lu, Nathan McCarty, and Benedikt Bünz
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13 DATED: May 3, 2022

HANSEN LAW FIRM, P.C.

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15 By: */s/ Craig A. Hansen*
CRAIG A. HANSEN
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17 Attorneys for Plaintiffs
18 Temujin Labs Inc., a Delaware corporation, and Temujin
19 Labs Inc., a Cayman Islands corporation
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